

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF
MICHIGAN SOUTHERN DIVISION

WACKER NEUSON PRODUCTION
AMERICAS, LLC, a Wisconsin limited
liability company,

Plaintiff,

v

CITY OF NORTON SHORES, a Michigan
Municipal Corporation,

Defendant.

Case No. 1:19-cv-00018-JTN-ESC

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DEFENDANT CITY OF NORTON SHORES EXPERT WITNESS DISCLOSURE

Defendant, City of Norton Shores, by and through its attorneys, Williams Hughes, PLLC, discloses the following expert witness(es) who may be called to testify and/or produce documentary evidence in this action:

1. H & S Companies
4575 Lake Michigan Dr. NW
Grand Rapids, MI 49534
Office: (616) 453-8551
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Randy Filbrandt, Certified Public Accountant, and/or Hilary Smith, Certified Public Accountant, or other available certified public accountant employed with H & S Companies, will be expected to testify within the field of his/her

expertise based on his/her knowledge, skill, experience, training, and/or education as a licensed accountant in the State of Michigan, more specifically regarding Plaintiff Wacker Neuson's financial documentation relating to its business operations during relevant time frames, including but not limited to plaintiff's profitability, profit and loss, production trends and figures, sales trends and figures, employment base, tax obligations and payments, tax abatements, value of abatements, Defendant City of Norton Shores' damages claims, and related matters

Dated: July 3, 2019

/s/ John M. Karafa
John M. Karafa (P36007)
Attorney for Defendant Norton Shores